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PACIFIC BELL TELEPHONE COMPANY

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

CALIFORNIA SPORTFISHING
PROTECTION ALLIANCE,

Plaintiff,

v.

PACIFIC BELL TELEPHONE COMPANY,

Defendant.

CASE NO. 2:21-cv-00073-JDP

**DECLARATION OF HARIKLIA KARIS IN
SUPPORT OF MOTION TO COMPEL
COMPLIANCE WITH SUBPOENA**

Judge: Hon. Jeremy D. Peterson

Complaint Filed: January 14, 2021

Zoom Hearing Date: November 9, 2023

Time: 10:00 a.m.

Courtroom: 9

I, Hariklia Karis, hereby declare as follows:

1. I am a partner at the law firm of Kirkland & Ellis LLP and counsel for Defendant Pacific Bell Telephone Company (Pacific Bell) in the above-captioned litigation. I submit this declaration in support of Pacific Bell's Motion to Compel Compliance with Subpoena. Unless otherwise indicated, I have personal knowledge of the facts set forth herein and, if called as a witness, I could and would testify competently thereto.

2. Attached as **Exhibit A** is a true copy of the About Us webpage from the Below the Blue website, captured September 25, 2023.

3. Attached as **Exhibit B** is a true and correct copy of an email between Susan Pulliam and Gordon Binkhorst on May 5, 2023, produced by Gordon Binkhorst as BINKHORST000850.

4. Attached as **Exhibit C** is a true copy of an email between Seth Jones, Monique Rydel Fortner, and Tom Neltner, between July 14 and 16, 2023, produced by the Environmental Defense Fund as EDF_0000001185.

5. Attached as **Exhibit D** is a true copy of the Lead Cable Investigation prepared by Marine Taxonomic Services, Ltd. on June 30, 2023, produced by the Environmental Defense Fund as EDF_0000002216.

6. Attached as **Exhibit E** is a true copy of a draft Lead Cable Investigation prepared by Marine Taxonomic Services, Ltd. on June 1, 2023, produced by the Environmental Defense Fund as EDF_0000000031.

7. Attached as **Exhibit F** is a true copy of an article written by John West *et al.*, published by the Wall Street Journal on July 9, 2023, titled "How the Journal Investigated Hidden Lead Cables Circling the U.S."

8. Attached as **Exhibit G** is a true copy of an article written by Susan Pulliam *et al.*, published Wall Street Journal on July 9, 2023, titled "America is Wrapped in Miles of Toxic Lead Cables."

9. Attached as **Exhibit H** is a true copy of the Blog webpage from the Below the Blue website, captured September 22, 2023.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed September 26, 2023 in Chicago, Illinois.

By: /s/ Hariklia Karis
HARIKLIA KARIS